

August 12, 2019

via ECFS and e-mail

Marlene H. Dortch Secretary, Office of the Secretary Federal Communications Commission 445 12th Street, SW, Room TW-A325 Washington, DC 20554

Re: CG Docket Nos. 05-231 and 13-24 MB Docket No. RM-11065

Docket No. RM-

Dear Ms. Dortch,

On August 8, 2019, I spoke to Michael Scurato in Commissioner Starks' office regarding the use of automatic speech recognition (ASR) in live television captioning and Internet Protocol captioned telephone service (IP-CTS) as it relates to the above-referenced dockets. In particular, I reiterated points raised by deaf and hard of hearing consumer groups and accessibility researchers in our July 26, 2018 ex parte on IP-CTS certification of ASR providers<sup>1</sup> and July 31, 2019 petition for declaratory ruling and/or rulemaking on live television captioning metrics.<sup>2</sup>

Please don't hesitate to let me know if you have any questions.

Respectfully submitted,

/s/

Blake Reid

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CC:

Michael Scurato, Office of Commissioner Starks

<sup>&</sup>lt;sup>1</sup> Letter from Blake Reid, Counsel to TDI, to Marlene H. Dorch, <a href="https://ecfsapi.fcc.gov/file/1091799662503/2018.07.26%20IP%20CTS%20Application%20">https://ecfsapi.fcc.gov/file/1091799662503/2018.07.26%20IP%20CTS%20Application%20</a> OFramework%20Final%20(attachment).pdf.

<sup>&</sup>lt;sup>2</sup> Petition of TDI, et al., <a href="https://www.fcc.gov/ecfs/filing/10801131063733">https://www.fcc.gov/ecfs/filing/10801131063733</a>.